

**FILED**

AO 91 (Rev. 11/11) Criminal Complaint

UNITED STATES DISTRICT COURT  
ALBUQUERQUE, NEW MEXICO

## UNITED STATES DISTRICT COURT MAR 11 2016

for the  
District of New MexicoMATTHEW J. DYKMAN  
CLERK

United States of America )

v. )

Ollisha Nicole EASLEY )

Case No. 16mj931

Defendant(s)

**CRIMINAL COMPLAINT**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of 3/10/2016 in the county of Bernalillo in the  
Federal District of New Mexico, the defendant(s) violated:*Code Section**Offense Description*

21 USC 841 (a)(1), (b)(1)(A)

Possession of over 500 grams of a  
mixture or substance containing a  
detectable amount of methamphetamine  
with intent to distribute

This criminal complaint is based on these facts:

\*\*\*\* SEE ATTACHED AFFIDAVIT \*\*\*\*

☒ Continued on the attached sheet.

Complainant's signature

Jarrell W. Perry, Special Agent

Printed name and title

Sworn to before me and signed in my presence.

Date: 3/11/2016City and state: Albuquerque, New Mexico

Judge's signature

Kirtan Khalsa U.S. Magistrate Judge

Printed name and title

**AFFIDAVIT**

On March 10, 2016, Drug Enforcement Administration (DEA) Special Agent (S/A) Jarrell W. Perry reviewed a Greyhound Bus Passenger List, which revealed two different passengers names, Ollichia EASLEY and Denise MOORE, reflecting travel from Claremont, California to Louisville, Kentucky, which was paid for with cash. S/A Perry observed that the reservation number for EASLEY and MOORE was the same, 83452217, which meant that both EASLEY and MOORE were traveling on the same reservation together. The Greyhound Bus Passenger List listed both EASLEY and MOORE as each having one piece of checked in luggage. S/A Perry knew from his experience that EASLEY and MOORE were traveling together on the Greyhound Bus from Claremont, California to Louisville, Kentucky.

On March 10, 2016, S/A Perry and DEA S/A Scott Godier were at the Greyhound Bus Station, 320 First Street, Albuquerque, New Mexico to meet the eastbound Greyhound Bus which makes a regularly scheduled stop in Albuquerque, New Mexico.

After the bus arrived and the passengers deboarded the bus during its normal layover in Albuquerque, New Mexico, S/A Perry and S/A Godier observed the luggage that was underneath of the bus as checked in luggage. S/A Perry observed a grey colored, "Rome Essentials" brand suitcase with a luggage check tag attached in the name of Ollichia EASLEY and a different black/tan colored, "G" brand suitcase with a luggage check tag attached in the name of Denise MOORE. The luggage check tag for each bag had the origination city of Claremont, California and the destination city of Louisville, Kentucky with the same contact telephone number of 502-510-3102 on each luggage check tag.

S/A Perry boarded the bus and approached a female, later identified as Ollisha Nicole EASLEY, who was seated in her respective seat on the Greyhound Bus. S/A Perry asked for and received permission from EASLEY to see her bus ticket, which revealed the name of Ollichia EASLEY, reflecting travel from Claremont, California to Louisville,

Kentucky. S/A Perry reviewed the Greyhound Bus ticket and immediately returned it to EASLEY. S/A Perry asked EASLEY if she was traveling with anyone else and EASLEY said that she was traveling alone. S/A Perry knew that this statement was not true due to the fact that EASLEY was traveling under the same reservation number as MOORE. S/A Perry asked EASLEY if she had any luggage with her on the bus and EASLEY identified as backpack and pillows that she had with her as belonging to her, as well as one checked in suitcase. S/A Perry asked for and received permission from EASLEY to search her backpack, pillows and checked in luggage for contraband. A consensual search of all of EASLEY's belongings revealed no form of contraband.

S/A Perry spoke with each passenger on the Greyhound Bus and was not able to locate anyone traveling under the name of Denise MOORE. S/A Perry spoke with the driver of the Greyhound Bus who boarded the passengers and retrieved the bus tickets for the passengers that reboarded the bus in Albuquerque, New Mexico. The Greyhound Bus driver informed S/A Perry that he did not have a reboarding ticket for a passenger in the name of Denise MOORE.

S/A Perry knew from his experience that two passengers have purchased bus tickets on the same reservation number and check two pieces of luggage. S/A Perry also knew from experience that one of the passengers does not travel and that the remaining passenger is responsible for transporting and delivering the checked in luggage of the passenger that does not travel that contains illegal narcotics.

S/A Perry spoke with EASLEY and EASLEY denied all interest and ownership in the black/tan colored, "G" brand suitcase with the name of Denise MOORE. EASLEY stated that she did not know who the suitcase belonged to and that no one gave her the suitcase to transport on the bus trip. S/A Perry determined from his experience that EASLEY abandoned the black/tan colored, "G" brand suitcase.

S/A Perry searched the black/tan colored "G" brand suitcase which revealed two clear plastic heat-sealed bundles concealed underneath of the inner lining of the suitcase.

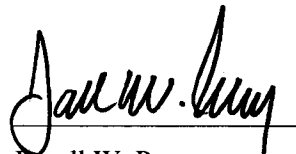
S/A Perry knew from his experience that the two clear plastic, heat-sealed bundles were consistent with the packaging and concealment of illegal narcotics. S/A Perry cut into one of the bundles, which revealed a clear crystal like substance that S/A Perry knew from experience to be consistent with crystal methamphetamine.

S/A Perry handcuffed EASLEY, thus placing her under arrest. EASLEY was transported to the DEA Albuquerque District Office (ADO).

At the DEA ADO, S/A Perry removed the two clear plastic heat-sealed bundles from the black/tan colored "G" brand suitcase. S/A Perry cut into both bundles, which revealed a clear crystal like substance. S/A Perry weighed the two bundles, approximately 4.05 gross kilograms (9.072 gross pounds). S/A Perry knew that based upon his training and experience that this is an amount that is consistent with distribution rather than personal use. S/A Perry field-tested the clear crystal like substance from both bundles, which revealed a positive reaction for the presence of methamphetamine

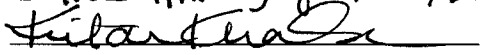
At the DEA ADO, S/A Perry read EASLEY her Miranda rights per DEA 13a. EASLEY waived her Miranda rights and agreed to answer questions. EASLEY said that she was responsible for transporting the black/tan colored "G" brand suitcase from Claremont, California and delivering it to Louisville, Kentucky. EASLEY said that she was to be paid \$1,000.00 and possibly more, upon delivering the suitcase what she believed to contain drugs to Louisville, Kentucky.

This affidavit is submitted for the limited purpose of providing probable cause to support the attached criminal complaint.



Jarrell W. Perry  
Special Agent  
Drug Enforcement Administration

Sworn to and Subscribed before  
me this 11th day of March, 2016.

  
United States Magistrate Judge